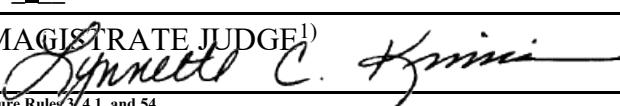


CRIMINAL COMPLAINT
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v. Jesus Gabriel Villela-Duran: DOB: 1994: Mexico Salvador Lopez-Vargas: DOB: 1986: Mexico Eleazar Soto-Diaz: DOB: 1987: Mexico	DOCKET NO. MAGISTRATE'S CASE NO. 22-06059MJ
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), 1324(a)(1)(A)(iii) & 1324(a)(1)(B)(i).	
<p>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: From a date unknown to on or about June 30, 2022, in the District of Arizona, Jesus Gabriel Villela-Duran, Salvador Lopez-Vargas, and Eleazar Soto-Diaz, named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with other persons, known and unknown, to transport and move certain illegal aliens including Juan Carlos Rodiles-Mendez, Alex Estuardo Jalal-Cabrerra, Hector Tellaz-Paz, Azeglio Alexander Chuc-Quibaja and Elmer Perez-Tomas, within the United States by means of transportation or otherwise, and/or to conceal, harbor, or shield said illegal aliens, all within the United States, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).</p>	
<p>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On or about June 30, 2022, in the District of Arizona, Homeland Security Investigations (HSI), had executed a search warrant on two addresses. Prior to June 30, 2022, Special Agents (SA's) had received information that Undocumented Non-Citizens (UNC's) were being harbored at 3622 W. Melvin Street, in Phoenix, Arizona. SA's conducted surveillance on that address, and observed UNC's being dropped off in parking lots of the Phoenix Metro Area and being transported to 3622 W Melvin Street. SAs also discovered UNC's were taken to the Sundowner apartments unit #118 to further their criminal activity.</p> <p>On June 30, 2022, HSI executed a search warrant at 3622 W Melvin Street, Phoenix, Az. (Melvin) and Sundowner apartments, #118, 4530 N 23rd Avenue, Phoenix, Az. (Sundowner) Continued on next page.</p>	
<p>MATERIAL WITNESSES IN RELATION TO THE CHARGE: Juan Carlos Rodiles-Mendez, Alex Estuardo Jalal-Cabrerra, Hector Tellaz-Paz, Azeglio Alexander Chuc-Quibaja and Elmer Perez-Tomas</p>	
<p>Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</p> <p>AUTHORIZED BY: AUSA AAA/_____</p>	<p>SIGNATURE OF COMPLAINANT JASON W KIRK Digitally signed by JASON W KIRK Date: 2022.07.01 09:25:54 -07'00'</p> <p>OFFICIAL TITLE Homeland Security Investigations Agent</p>
<p>Sworn by telephone <u>x</u></p>	
<p>SIGNATURE OF MAGISTRATE JUDGE¹⁾ </p>	
<p>DATE July 1, 2022</p>	

¹⁾ See Federal Rules of Criminal Procedure Rule 3, 4.1, and 54

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED:

At the Sundowner address, SA's located 30 (UNC's) in the residence, excluding Jesus Gabriel Villela-Duran. None of these individuals had legal permission to be in the United States.

Material witness Juan Carlos Rodiles-Mendez was located at the Sundowner address. He indicated he crossed into the United States near Cananea, Sonora, Mexico. He agreed to pay \$10,000 for his smuggling fee. Rodiles-Mendez was able to identify a person, VILLELA-Duran as the caretaker of the apartment. Rodiles-Mendez was also able to identify another individual Salvador LOPEZ-Vargas. LOPEZ-Vargas gave instruction to VILLELA-Duran while in the apartment. LOPEZ-Vargas was arrested before executing the search warrant at 3622 W Melvin Street on June 30, 2022.

On June 30, 2022, while agents were at the Melvin address, a Honda Odyssey approached the address. This Odyssey had been identified as vehicle used in the smuggling organization. The van immediately left the area of the residence and agents were able to stop the vehicle. The driver was identified as Salvador LOPEZ-Vargas. There were seven (7) individuals in the back two rows of the van. None of the individuals had legal permission to be in the United States and were determined to be UNC's. One person was identified as Elmer Perez-Tomas, who is from Chiapas, Mexico and illegally crossed into the United States near Douglas, Arizona. He agreed to pay money for his smuggling fee. He indicated a red van picked him up in Phoenix, which was the same van stopped by agents, being driven by LOPEZ-Vargas. A Ruger .380 handgun was located in the van.

Material witness Alex Estuaro Jalal-Cabrerra was also in the Sundowner apartment. He is from Guatemala and stated he made arrangements to be smuggled while in Guatemala. Jalal-Cabrerra said his fee was going to be \$13,500 dollars. He identified VILLELA-Duran as the person in charge of watching over the apartment.

Post-Miranda, VILLELA-Duran admitted to transporting UNC's from drop off locations in Phoenix to 4530 N 23rd Avenue and maintaining the apartment for harbored UNC's and watching over them until they departed to the interior of the United States.

While at the Melvin address, agents observed a silver Expedition depart the target residence. Agents observed one individual go into Food City, purchase supplies, then go back to the vehicle. Agents approached both individuals as they were loading supplies into the Expedition. Agents determined they were both present in the United States illegally.

Material witness Tellaz-Paz was the passenger in the Expedition and identified SOTO-Diaz as the person in charge of the house. SOTO-Diaz was the driver of the Expedition. Tellaz-Paz also identified LOPEZ-Vargas and indicated LOPEZ-Vargas drove him to the Melvin house a couple days prior to June 30, 2022. He also indicated LOPEZ-Vargas was also in control of the house along with SOTO-Diaz. Tellaz-Paz was in the country illegally and had agreed to pay money to be smuggled into the United States.

Material witness Azeglio Alexander Chuc-Quibaja is from Guatemala and stated he made arrangements to be smuggled from Guatemala for \$50,000 Quetzales. Chuc-Quibaja was found inside of the Melvin address. Chuc-Quibaja identified SOTO-Diaz and stated SOTO-Diaz would read off a roster each night for UNC's departing the house for the interior of the United States. A total of 49 people were located in the Melvin address. None of these individuals had legal permission to be in the United States and were all in the country illegally.